

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAMUEL ALEXANDER KUHL,

Defendant.

**INDICTMENT**

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The Grand Jury charges:

**COUNT 1**

(Sexual Exploitation of a Minor)

Between on or about May 13, and October 31, 2021, in the Southern Division of the  
Western District of Michigan,

**SAMUEL ALEXANDER KUHL**

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage  
in sexually explicit conduct for the purpose of producing visual depictions of that  
conduct, which depictions were produced using materials that had been mailed, shipped,  
or transported in or affecting interstate or foreign commerce by any means, including by  
computer.

Specifically, the defendant used a 15-year-old girl to engage in sexually explicit  
conduct and received and stored photographs of that conduct using his Samsung and  
iPhone cellular phones, both of which were manufactured outside the United States.

**18 U.S.C. § 2251(a), (e)**

**18 U.S.C. § 2256**

**COUNT 2**

(Coercion and Enticement and Attempted Coercion and Enticement)

From on or about May 13, and October 31, 2021, in the Southern Division of the Western District of Michigan,

**SAMUEL ALEXANDER KUHL**

used facilities and means of interstate and foreign commerce to communicate with an individual under the age of 18 to attempt to knowingly persuade, induce, entice, and coerce that individual to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, the defendant used cellular telephones and Facebook Messenger, all of which were facilities of interstate and foreign commerce, to communicate with Minor 1, a 15-year-old female, in order to persuade, induce and entice her to have sexual intercourse with him, conduct constituting Third Degree Criminal Sexual Conduct under Michigan Compiled Laws § 750.520d.

**18 U.S.C. § 2422(b)**

**FORFEITURE ALLEGATION**  
(Sexual Exploitation of a Minor)

The allegations contained in Count 1 of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2251,

**SAMUEL ALEXANDER KUHL**

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2251; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property. The property to be forfeited includes, but is not limited to a Samsung, Model SM-S901U1, Factory #R3CT30LK50N, 20220317 and an iPhone Model D54pAP, serial number F2LFVK860D46.

If any of the property described above, as a result of any act or omission of the defendant,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or

5. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)  
18 U.S.C. § 2251  
18 U.S.C. § 2256

**FORFEITURE ALLEGATION**

(Coercion and Enticement and Attempted Coercion and Enticement)

The allegations contained in Count 2 of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of 18 U.S.C. § 2422,

**SAMUEL ALEXANDER KUHL**

shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. Samsung, Model SM-S901U1, Factory # R3CT30LK50N, 20220317 and an iPhone Model D54pAP, serial number F2LFVK860D46.

If any of the property described above, as a result of any act or omission of the defendant,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 2428  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)  
18 U.S.C. § 2422

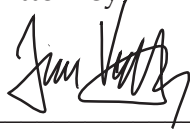
A TRUE BILL



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GRAND JURY FOREPERSON

MARK A. TOTTEN  
United States Attorney



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TIMOTHY VERHEY  
Assistant United States Attorney